

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TREASURE CHEST THEMED VALUE MAIL,
INC.,

Plaintiff,
-against-

DAVID MORRIS INTERNATIONAL, INC.,

Defendant.

Case No. 1:17-0001

**REPLY TO DEFENDANT'S
COUNTERCLAIMS**

ECF Case

Plaintiff, Treasure Chest Themed Value Mail, Inc., by and through its attorneys, Knox Law Group, PC, answers the counterclaims contained in the defendant's Amended Answer:

1. Paragraph "1" of defendant's counterclaims does not contain an allegation of fact that warrants a response from plaintiff.
2. Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "2" of defendant's counterclaims.
3. Plaintiff admits the allegations contained in paragraphs "3" and "4" of defendant's counterclaims.
4. Plaintiff admits the allegations contained in paragraph "5" of defendant's counterclaims solely to the extent that Plaintiff maintains an active status in its business.
5. Plaintiff admits the allegations contained in paragraphs "6", "7", "8", "9", "10", "11", "12" and "13" of defendant's counterclaims.
6. Plaintiff denies the allegations contained in paragraph "14" of defendant's counterclaims.
7. Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "15" of defendant's counterclaims.

8. Plaintiff denies the allegations contained in paragraphs “16” and “17”, “18”, “19”, “20”, “21”, “22”, “23” and “24” of defendant’s counterclaims.

9. Paragraph “25” of defendant’s counterclaims does not contain an allegation of fact that warrants a response from plaintiff.

10. Plaintiff admits the allegations contained

11. Plaintiff denies the allegations contained in paragraph “26” of defendant’s counterclaims to the extent that the written contract between the Plaintiff and Defendant expressly states all of the obligations agreed to between the parties.

12. Plaintiff admits the allegations contained in paragraph “27”, “28”, and “29” of defendant’s counterclaims.

13. Plaintiff denies the allegations contained in paragraph “28” of defendant’s counterclaims.

WHEREFORE, Plaintiff respectfully prays for an Order dismissing the defendant’s counterclaims with prejudice and costs, and granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
July 19, 2017

KNOX LAW GROUP, P.C.
Attorneys for Plaintiff

By: Daniel Knox
Daniel Knox
One Penn Plaza, Suite 2430
New York, New York 10119
Phone: (212) 239-1114
E-mail: dknox@knoxlaw.nyc

To: Lehman LG LLC
244 Fifth Ave., Suite B258
New York, New York 10001